

## UNITED STATES DISTRICT COURT

JUN 17 2011

Middle DISTRICT OF Tennessee BY

DEPUTY CLERK

UNITED STATES OF AMERICA  
V.(1) HAWO OSMAN AHMED  
(2) IFRAH ABDI YASSIN  
(3) HAMDI AHMED MOHAMUD

## CRIMINAL COMPLAINT

Case Number:

11-4032 JSB

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about June 16, 2011 in Davidson County, in the Middle District of <sup>(Date)</sup> Tennessee & Minneapolis, Minnesota defendant(s) did,

(Track Statutory Language of Offense)

Did knowingly engage in conduct and thereby cause bodily injury and attempt to cause bodily injury to another person and threatened to do so with intent to retaliate against a person for attendance of a witness or party at an official proceeding or any testimony given or any record, document, or other object produced by a witness in an official proceeding, that is a proceeding before a judge or court of the United States or a Federal grand jury and did knowingly engage in conduct and thereby cause bodily injury and attempt to cause bodily injury to another person for information relating to the commission or possible commission of a Federal Offense in violation of Title 18 United States Code, Section(s) 1513(b)(1) and 1513(b)(2).

I further state that I am a(n) FBI TFO/ST PAUL MN PD and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part of this complaint:  Yes  No

Heather Weyker  
Signature of Complainant

HEATHER WEYKER  
Printed Name of Complainant

Sworn to before me and signed in my presence,

6/17/2011 Thomas A. Wiseman, Jr.  
Date

THOMAS A. WISEMAN, JR. SR US DISTRICT JUDGE  
Name of Judge Title of Judge

at Nashville, TennesseeCity State

Thomas A. Wiseman, Jr.  
Signature of Judge

AFFIDAVIT

Your affiant is a Police Officer with the St. Paul Police Department and has been employed there for the last 12 years and is also Federal Bureau of Investigation Task Force Officer. Your affiant is currently assigned to the Vice Unit and is part of a federally funded human trafficking task force which investigates human trafficking crimes and other related crimes such as drugs, fraud and smuggling. On June 16, 2011, your affiant became involved in the investigation of an assault of a federal witness who will be referred to by her initials as M.A. in this affidavit. The facts known to me in this affidavit are derived from my participation in the investigation as well as information received by other officers and or federal agents.

On May 4, 2011, the Federal Grand Jury Middle District of Tennessee issued a Second Superseding Indictment charging 30 persons with various federal offenses. The persons charged are either members of a gang known as the Somali Outlaws/Somali Mafia, the Lady Outlaws, or associates of these gangs. This case is listed as United States v. Adan et. al, Criminal Case 3:10-00260, Middle District of Tennessee, Judge Haynes. The indictment alleges conspiracy to sex traffic juvenile females, the sex trafficking of juvenile females, obstruction of justice, perjury, conspiracy to commit access device fraud and other charges. The persons charged in the indictment are:

1. [1] ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO", was an associate of members of the SOL/SM.
2. [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", was a member of the SOL/SM.
3. [3] AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS", was a member of the SOL/SM.

4. [4] YAHYA JAMAL AHMED, was a member of the SOL/SM.
5. [5] ABDIKARIM OSMAN ALI, a/k/a "HOMER" a/k/a "BIG ABDI", was a member of the SOL/SM.
6. [6] MUSSE AHMED ALI a/k/a "FAT BOY", was an associate of members of the SOL/SM.
7. [7] HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN", was a member of the SOL/SM.
8. [8] FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE" was an associate of members of the SOL/SM.
9. [9] IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN", was a member of the SOL/SM.
10. [10] YASIN AHMED FARAH was an associate of members of the SOL/SM.
11. [11] ABDULLAHI HASHI a/k/a "KAMAL", was a member of the SOL/SM.
12. [12] FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR", was a member of the SOL/SM.
13. [13] ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE", was a member of the SOL/SM.
14. [14] MUHIYADIN HUSSEIN HASSAN a/k/a "CD", was an associate of members of the SOL/SM.
15. [15] DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY", was an associate of members of the SOL/SM.
16. [16] ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO", was an associate of members of the SOL/SM.
17. [17] ANDREW KAYACHITH a/k/a "AK", was an associate of members of the SOL/SM.
18. [18] ABDIGADIR AHMED KHALIF a/k/a "AWALI", was an associate of members of the SOL/SM.

19. [19] BASHIR YASIN MOHAMUD a/k/a "BR", was a member of the SOL/SM.
20. [20] MUSTAFA AHMED MOHAMED, was an associate of members of the SOL/SM.
21. [21] FUAD FAISAL NUR a/k/a "HANJULE", was a member of the SOL/SM.
22. [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", was an associate of members of the SOL/SM/LOL and is the brother to defendants 23 and 24.
23. [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", was an associate of members of the SOL/SM/LOL and is the brother to defendants 22 and 24.
24. [24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO", was an associate of members of the SOL/SM/LOL and is the brother to defendants 22 and 23.
25. [25] HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY", was a member of the LOL and a gang called the Lady Bravehearts.
26. [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", was a member of the SOL/SM.
27. [27] BIBI AHMED SAID, was an associate of members of the SOL/SM/LOL.
28. [28] AHMED AWEYS SHEIK
29. [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR", was a member of the SOL/SM.
30. [30] MOHAMED AHMED AMALLE a/k/a "DK", was an associate of members of the SOL/SM.

Twenty Five of the defendants are charged with conspiracy to violate Title 18 U.S.C. § 1591 in violation of Title 18 U.S.C. § 1594(c) in counts one and two of the indictment. Those persons are

[1] ABDIFITAH JAMA ADAN a/k/a "SHORTY" a/k/a "FALEEBO" a/k/a "KUZZO", [2] ABDULLAHI SADE AFYARE a/k/a "FOREHEAD", [3] AHMAD ABNULNASIR AHMAD a/k/a "FABULOUS", [5] ABDIKARIM OSMAN ALI, a/k/a "HOMER" a/k/a "BIG ABDI", [6] MUSSE AHMED ALI a/k/a "FAT BOY", [7] HASSAN AHMED DAHIR a/k/a "MOHAMED ALI HUSSEIN", [8] FADUMO MOHAMED FARAH a/k/a "NAANA NAANA" a/k/a "GANGSTER BOO" a/k/a "BARNIE", [9] IDRIS IBRAHIM FAHRA a/k/a "CHI TOWN", [11] ABDULLAHI HASHI a/k/a "KAMAL", [12] FATAH HAJI HASHI a/k/a "JERRY" a/k/a "JR", [13] ABDIRAHMAN ABDIRAZAK HERSI a/k/a "BIGGIE", [14] MUHIYADIN HUSSEIN HASSAN a/k/a "CD", [15] DAHIR NOR IBRAHIM a/k/a "DAHIR LUCKY", [16] ABDIFATAH BASHIR JAMA a/k/a "CASH MONEY" a/k/a "OHIO", [17] ANDREW KAYACHITH a/k/a "AK", [19] BASHIR YASIN MOHAMUD a/k/a "BR", [20] MUSTAFA AHMED MOHAMED, [21] FUAD FAISAL NUR a/k/a "HANJULE", [22] ABDIFATAH SHARIF OMAR a/k/a "BRITISH" a/k/a "PINKY", [23] LIBAN SHARIF OMAR a/k/a "SUNDERRA", [24] MOHAMED SHARIF OMAR a/k/a "MOE D" a/k/a "MOJO", [25] HAMDI ALI OSMAN a/k/a "BIG HAMDI" a/k/a "BOSS LADY", [26] HAJI OSMAN SALAD a/k/a "HOLLYWOOD", [29] YASSIN ABDIRAHMAN YUSUF a/k/a "JUNIOR" a/k/a "BLACK CAT JUNIOR" and [30] MOHAMED AHMED AMALLE a/k/a "DK".

The witness who I refer to as MA has provided information to law enforcement agents prior to the indictment being issued in the above referenced case. The witness also appeared before the Federal Grand Jury, Middle District of Tennessee, during the course of the investigation in this case. MA could be called by any party in this case as a witness at trial, should one occur.

On 06-16-11 at approximately 1844 hrs, I, FBI TFO Heather Weyker, received a phone call from MA. At the time of the phone call I was in Nashville, TN. MA was in Minneapolis, MN. When I answered the phone, MA was crying and very upset, breathing heavy and out of breath. MA was a juvenile when this case was initiated and is now an adult. Also present during the conversation was ICE SA Tony Langeland, TBI SA Jason Wilkerson. MA stated that she had been assaulted by three females and that the police were outside. MA stated the assault had occurred at her apartment building located in Minneapolis, Minnesota. MA stated the assault was related to the case in Nashville. MA stated that she would call back in a minute.

After speaking with MA I called the Minneapolis Police Department and was able to speak briefly with a patrol officer on the scene, Officer Beeks. Officer Beeks advised that MA had been involved in an altercation with three other females and that the other females were alleging that MA had a knife at one point during the altercation. Officer Beeks stated this assault occurred at MA's apartment building in Minneapolis, MN.

After speaking with Officer Beeks I received a phone call from MA. Due to the information I received from Officer Beeks, I decided to read MA her Miranda rights out of an abundance of precaution. I then read MA her Miranda Rights, per SPPD Form PM 247.1-95R. Also present during the conversation was TBI SA Jason Wilkerson. ICE Special Agent Toney Langeland was also present during part of this conversation. MA verbally stated she understood her rights and agreed to speak with us.

MA told us the address of the incident was at her apartment building in Minneapolis, MN., identifying the exact location. MA said she and her father, were walking back from Walgreen's, returning to her apartment building. MA stated they entered the building, and MA waited by the

elevators. MA's father checked his mailbox area, and MA noticed a girl, known to her as Hawo, (later identified by police officers as Hawo Osman Ahmed) pounding on the outside window. Hawo pointed at MA and told her she wanted to speak with her. As MA walked to the door, she observed Ifrah (later identified by police officers as Ifrah Abdi Yassin) standing behind Hawo. MA's father then opened the door for the two females and they entered the lobby area.

After the girls entered the building, Hawo Osman Ahmed and Ifrah Abdi Yassin said "MA let me talk to you". They then went to the corner of the door lobby area. Hawo asked MA why she was talking about her (Hawo) to other people. At that time, MA observed Hawo Osman Ahmed start to take off her earrings. MA asked Hawo Osman Ahmed if she was going to fight MA. Hawo Osman Ahmed said yes.

Hawo Osman Ahmed asked why MA was talking "shit" about her to another girl and provided a name of that person. MA states she does not know a person by that name. Ifrah Abdi Yassin interrupted, and stated " I want to talk to her about what I need to talk to her about." Ifrah Abdi Yassin said to MA "you locked all my ni\*\*\*z up." MA asked "who?" Ifrah Abdi Yassin replied, "The SOL". MA asked ,who she was talking about. Ifrah Abdi Yassin replied, "ChiTown." MA asked Hawo Osman Ahmed and Ifrah Abdi Yassin if they wanted to fight. Hawo Osman Ahmed and Ifrah Abdi Yassin replied yes and confirmed that they wanted to fight. MA said that the 3rd girl (later identified by police officers as Hamdi Ahmed Mohamud) had come in shortly after the first two entered, who she stated she knew as Hameda. Hawo Osman Ahmed finished taking off her earrings which meant to MA that she was going to fight her. MA said ok, she would fight, she just wanted to change clothes. She informed the girls they could follow her up to her apartment

while she changed clothes. Hawo Osman Ahmed said she wanted to fight her together with the other two girls. All girls then get into the elevator together.

Once inside the elevator, MA said she tried to push her floor button, which was the 3rd floor, but Hawo Osman Ahmed pushed the pause button on the elevator, which stopped it. MA isn't sure how they managed to do that, she just did. MA said Hawo "hit me", and the other two tried to hold me on the floor. MA was able to some how push a button on the elevator during the fight. MA said in her defense, she tried to hold Hawo Osman Ahmed against the wall of the elevator so she wouldn't continue to be struck by the girls.

MA said somewhere during the elevator altercation, she was cut with a knife that one of the girls was carrying. MA said she did not initially see the knife, and thought it was a folding knife. MA said she was struck by the knife on her hand and wrist area, in which she has several cuts.

MA said the elevator doors opened on the second floor and she was able to escape the elevator and run away from the 3 girls. MA said the girls attempted to chase after her, but she was able to get away. MA ran to her mother's apartment on another floor. MA said she obtained a knife and went back down stairs.

MA stated when she got downstairs, she observed the car the three girls came in, and went over to it, and broke a car window. MA stated she saw the three girls, Hawo Osman Ahmed, Ifrah Abdi Yassin, and Hameda coming out of the building and they were running towards her with a knife. MA said Hawo had her cell phone out like they were video taping her do damage to her car. MA said at the time the three girls exited the building, her mother came out the same door and confronted the three girls. One of the three girls then struck her mother on the facial area. When MA saw the girls fighting with her mother, she ran to her aid and struck one of them on the head

with the butt end of the knife. MA said Ifrah Abdi Yassinh then struck her from behind on the head with an object MA thought Ifrah Abdi Yassinh got from the ground like a stick or other longer object. MA was unsure what the object was.

MA said the girls were telling her, " We are going to get you tonight..., we are gonna make sure something gets done to you tonight..., your not safe tonight at your home." "Your gonna get it." MA said she was able to get away from the three girls again and she tried to call 911 for help. She then called me.

MA said she was scarred and in fear for her life. MA said she has been threatened in regards to this case. MA said she knew Hawo and used to be friends when they lived next to each other in Hopkins, MN. They got into an argument over a cell phone during that time. MA also knew Hameda from that time. Prior to June 16, 2011, MA had never met Ifrah Abdi Yassinh, but had seen a few times.

MA stated she had seen said she has seen Hawo and Hameda in a car with Junior (Yasin Yusuf #29), Abdullahi (Abdullahi Sade Afayre #2), Mohamed Afyare (Abdullahi Sade Afayre's brother). MA knows these persons to be SOL gang members.

I have also spoken with FBI agent Kate Koeth who interviewed MA's mother as well as Hamdi Mohamud, Hawo Osman Ahmed and Ifrah Abdi Yassin.

Agent Koeth interviewed LAH, year of birth, herein after "YOB" 1977. LAH identified herself as MA's mother. LAH stated that she was sleeping and her husband woke her regarding her daughter. LAH ran downstairs and there were three girls fighting with MA. LAH observed an object in MA's hand but was not sure what it was. LAH observed MA to be making motions with the object. LAH heard the three girls fighting with MA to state "Our n\*\*\*\*ers, you put in jail so I

am going to put you and your mother in jail tonight. LAH then took MA back to their apartment. LAH also stated that groups of Somalis had come by the apartment to harass MA for the past couple of months.

Agent Koeth also interviewed Hamdi Mohamud a/k/a Hameda Mohamud, YOB 1993.

Mohamud stated that approximately one to two hours prior to speaking with agent Koeth she and Ifrah Abdi Yassin and Hawo came to the building in which MA is located to see a male friend of Hawo. Mohamud was unable to provide a name for the male friend or an apartment number. Mohamud stated she used to hang out with MA. Hawo confronted MA about MA talking about Hawo. Mohamud stated that Ifrah Abdi Yassin was not talking at that time. Mohamud stated she then saw MA with a knife as if she was going to stab someone and took a cell phone photo. Agent Koeth asked Mohamud what happened at the location and who was fighting and Mohamud stated that she did not know anything about that and reiterated that it was a verbal argument and that she attempted to stay back from the argument.

Agent Koeth also interviewed Hawo Osman Ahmed, YOB 1992. Ahmed, after being read her Miranda rights and acknowledging them voluntarily answered agent Koeth's questions. Ahmed stated she is 8 weeks pregnant with her 4<sup>th</sup> child. Ahmed stated they arrived at approximately 4 p.m. at MA's apartment complex and that the police arrived at approximately 4:20 p.m. Ahmed stated she came to the apartment complex with Mohamud and Ifrah Abdi Yassin. She stated that she has known Ifrah Abdi Yassin since 2006 and has known Mohamud since the end of 2008, the beginning of 2009. Ahmed stated she came to the apartment to see her home boy "Gamo", which she explained was his street name which translates to "hand". Ahmed stated that she also knew "Gamo" by the name of Abdi and that Abdi lived on the second floor of the apartment. Ahmed stated she saw MA

in the hallway with Ifrah Abdi Yassin and they were arguing over a boyfriend issue. Ahmed stated that the boyfriend was "Fahad" and was MA's boyfriend and Ifrah Abdi Yassins boyfriend on the side. Ahmed stated that MA once stayed at Ahmed's place for two months and that was how they were close at one time. Ahmed stated that MA and Ifrah Abdi Yassin were arguing both downstairs and upstairs. Ahmed stated that she and MA, fought which included hair pulling and pushing and shoving. MA at one point ran upstairs. Ahmed then went downstairs. Ahmed then observed MA with a knife and MA's mother with a big stick. MA made motions as if going to cut them and Ahmed stated she got knicked in the head. Ahmed stated Ifrah Abdi Yassin was grazed on her face. Ahmed told Mohamud to record the fight and Mohamud took pictures. MA hit the windshield of Ahmed's car with the knife. MA then ran when Mohamud began recording the incident.

Agent Koeth also interviewed Ifrah Abdi Yassin, YOB 1991. Agent Koeth Mirandized Yassin. Yassin stated that she, Mohamud, and Ahmed arrived at the apartment at approximately 6:30 p.m. and that they had come to the apartment building from the 24 mall. Yassin stated she did not know anyone in the building but did know of MA. Yassin stated that Ahmed came to the apartment building to see a friend but did not know if it was a boy or a girl, but thought it was a girl. Yassin stated that MA opened the door to the apartment lobby. She stated that Ahmed and MA started arguing. She stated that MA did not like Yassin because MA's boyfriend Fahad likes Yassin. Yassin stated no one touched each other until they were in the elevator. Yassin stated she had not told the responding Minneapolis PD officers the truth regarding the fight in the elevator but wanted to tell agent Koeth the truth because she now believed there was a video of the fight in the elevator. Yassin stated MA pushed the elevator button and floors 2, 3, and 4 were lit up. MA and Ahmed were going to fight because MA was calling Ahmed a "ho" and other girl type stuff. Ahmed pushed

MA and MA pushed back. Yassin became involved because Ahmed was pregnant and there was pushing and pulling of hair. Yassin punched MA 2-3 times. Later MA had a kitchen knife and approached Yassin trying to stab her. MA had gotten off on the second floor and the other girls continued to ride the elevator, eventually returning downstairs. By the time Yassin, Mohamud and Ahmed arrived outside, Yassin observed MA to be hitting the windshield of her vehicle and MA's mother to be hitting the car with a stick. Yassin stated she was slapped with the knife.

Agent Koeth asked Yassin who was talking about the guys getting locked up. Yassin stated she knew a lot of those guys. Yassin stated she had asked MA if she was involved in that. Yassin explained there was an incident where MA was with Yassin, and Ahmed in a car. At one point a male who Yassin identified as Abshir a/k/a "Black" got in the car and observed MA. Upon seeing MA, Abshir a/k/a Black stated that MA was the reason that "half the guys got locked up". Abshir a/k/a Black then got out of the vehicle.

Agent Koeth then asked Yassin who knows "Idris" and Yassin denied knowing anyone named "Idris". Agent Koeth then asked Yassin who knows "ChiTown". Yassin responded that she knew ChiTown and acknowledge she also knew him as Idris. Yassin stated she had dated "ChiTown" in 2005. Yassin stated that she knows Hamdi (Hamdi Ali Osman), Jerry (Fatah Haji Hashi), Forehead (Abdullahi Sade Afyare) and Hanjule (Fuad Nur). She stated that Hanjule was her cousin. Yassin stated she left the country May 25, 2008 and returned April 16, 2011, having traveled in Kenya, Johannesburg, Dubi, and London in relation to her father's business. Yassin then began to attempt to ask Agent Koeth questions regarding the case in the Middle District of Tennessee,

including asking if any of the defendants would be getting out. Agent Koeth did not respond to Yassin's questions.

Further affiant sayeth not.

  
HEATHER WEYKER,  
FBI TASK FORCE OFFICER  
ST PAUL MN PD OFFICER

Sworn to and subscribed before me this 17th day of June, 2011.

  
THOMAS A. WISEMAN JR  
Senior United States District Judge  
Middle District of Tennessee